

# **EXHIBIT H**

**All Nippon Airways  
vs.  
United Airlines**

Deposition of  
**John Rediger**  
Volume 1

January 24, 2008

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Job: 1-6198

John Rediger

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1 Q. What day do they go to?

2 A. '86. This is a training record certification

3 from TK in '86. Here's one, '86. And here's one for

4 '84, certificate of training for -- '79, so as far as I

5 know they're all here.

6 Q. And what is the archiving that you're pointing

7 to right now, sir?

8 A. I assume that that's some sort of -- all these

9 in here, I don't really know.

10 Q. Just read to us what's in the beginning of the

11 first of those pages.

12 A. United Airlines/flight operations/pilot

13 qualifications/core certifications/qualifications. And

14 this is /777/777 proficiency check.

15 Q. And that has a whole list of documents that it

16 indicates are not within the group but have been

17 archived in some way?

18 A. I don't know. I'd have -- I really don't

19 know. This is the first time I've actually looked

20 through my training records. This is the first time

21 I've seen this form.

22 Q. Up until this morning I haven't had the

23 opportunity to see them either.

24 A. Yeah, so, this is -- here's another United

25 Airlines/flight operations/ability qualifications/STARS

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1 training history.

2 Q. Well, is there any -- among any of those

3 documents, is there any of the actual material used

4 during training?

5 A. For training purposes?

6 Q. Yeah.

7 A. No.

8 Q. That's -- you have some proficiency checks in

9 there?

10 A. Yeah.

11 Q. And some test results or completion of

12 courses?

13 A. Line checks and proficiency checks and

14 security trainings.

15 Q. But the actual training material is not in

16 there?

17 A. No.

18 Q. And, sir, as I understand it, you brought no

19 documents with you --

20 A. No.

21 Q. -- here to this deposition?

22 A. No.

23 Q. There are no documents in Exhibit 6 that would

24 constitute your file of this accident?

25 A. My what?

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1 Q. Your file of this accident.

2 A. No.

3 Q. And I think you've indicated to us you have no

4 documents except maybe a copy of your statement?

5 A. Right.

6 Q. So you wouldn't have a file; correct?

7 A. Just, you know, this and whatever -- whatever

8 else is in the -- whatever else is in the file.

9 Q. What file -- I'm talking about your file.

10 A. My file, right.

11 Q. You do have a file?

12 A. Yes.

13 Q. And where is that?

14 A. It's at home.

15 Q. And what is in that file?

16 A. It's just -- what is in it is -- this is in

17 it.

18 Q. Please read the exhibit number, sir.

19 A. Exhibit 4.

20 Q. And what else is in it that relates to this

21 accident?

22 A. And just, you know, some notes I probably made

23 at some point during the process to help me write this.

24 That's the main thing.

25 Q. Anything else?

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1 A. No.

2 Q. And what are those notes? How many pages are

3 they?

4 A. Just, I mean, if you put them all together,

5 there's probably one or two probably. I don't know. I

6 don't recall.

7 Q. Sir, please look at Exhibit 4. The accident

8 was on October 7, 2004, bottom left-hand corner is a

9 date, October 14. Did I just say 2004?

10 A. I think you did.

11 Q. Withdrawn.

12 Sir, please look at Exhibit 4, and as we know

13 the accident was on October 7, 2003. Looking down at

14 your signature at the bottom, it says October 14, 2003;

15 correct?

16 A. Yeah.

17 Q. Did you prepare anything the day of the

18 accident?

19 A. We have what's called FSAP, flight safety

20 awareness program that within 24 hours of an incident

21 like this, or I mean, something that we consider is a

22 safety issue, accident, incident, something that affects

23 safety, we're supposed to fill out what's called an FSAP

24 report. We do that electronically.

25 Q. And did you do that in this case?

23 (Pages 86 to 89)

John Rediger

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1 A. I did that.  
 2 Q. Did you ever print out a copy of that?  
 3 A. I think what happened is I tried to print it  
 4 and it wouldn't print. I did it at the flight  
 5 operations and it told me that it sent it, but I don't  
 6 think I actually ever got a hard copy of it.  
 7 Q. Who did you address it to?  
 8 A. Go on our company website, Skynet, and you go  
 9 to the FSAP report section of the website and you just  
 10 electronically fill it out and answer the questions.  
 11 Q. After the accident, did you prepare the FSAP  
 12 report the first day, the day of the accident?  
 13 A. I did.  
 14 Q. Did you prepare any other reports other than  
 15 the FSAP and Exhibit 4?  
 16 A. No. Not that day.  
 17 Q. On any day did you --  
 18 A. After --  
 19 Q. Excuse me, sir.  
 20 On any day after the accident, did you prepare  
 21 any report other than the FSAP report and Exhibit 4  
 22 concerning this accident?  
 23 A. Not a report, no.  
 24 Q. Did you prepare any material concerning this  
 25 accident other than Exhibit 4 and your FSAP report?

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1 A. No.  
 2 Q. Did anyone interview you?  
 3 A. No.  
 4 Q. You had no interviews. I think you did  
 5 mention you met with Mr. Torpey this week.  
 6 A. Right.  
 7 Q. But other than that, did anyone interview you  
 8 about this accident at any time since the moment of the  
 9 accident until today?  
 10 A. We had a flight safety inquiry. That was  
 11 after -- that's subsequent to the FSAP report. They  
 12 determine at that time whether there needs to be a  
 13 flight safety inquiry. And what it is, it's a  
 14 conference phone call between the training center,  
 15 flight management, the pilots, our ALPA, which is our  
 16 union representatives. And what they try to do, it's an  
 17 inquiry, trying to interview us over the phone, trying  
 18 to determine more in-depth what happened.  
 19 Q. And when did that phone conference call occur?  
 20 A. I don't recall. It was -- I just don't really  
 21 recall when it occurred.  
 22 Q. Was it, you know, more than a few weeks after  
 23 the accident?  
 24 A. Probably, yeah, more than a few weeks. But  
 25 I'm not certain.

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1 Q. Did you ever receive any written material,  
 2 minutes, notes, preparation material, either before,  
 3 during or after that meeting?  
 4 A. No.  
 5 Q. You've never seen a single word in writing  
 6 about that meeting or as a result of that meeting; is  
 7 that correct?  
 8 A. Not that I can recall.  
 9 Q. Did you see anything online on the company  
 10 email about that inquiry?  
 11 A. This particular incident?  
 12 Q. Yes.  
 13 A. No, I didn't.  
 14 Q. Did you ever learn the results of that  
 15 inquiry?  
 16 A. No.  
 17 Q. Have you, to this day, seen any sort of action  
 18 or procedure that resulted from this accident?  
 19 A. No.  
 20 Q. Are you aware of any procedures that have  
 21 changed as a result of this accident?  
 22 A. No.  
 23 Q. Have you observed any differences in the  
 24 activities of the push crew at gate 102 as a result of  
 25 this accident?

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1 A. I don't really think I've been out of gate  
 2 102, believe it or not, since that incident. And  
 3 that -- I never get there. I'm not sure why, but I  
 4 really don't think -- I've been out of 100 a couple  
 5 times, but I don't think I've really been out of 102.  
 6 Q. Have you been out of most of the 90s gate --  
 7 excuse me. Sir, gate G in the 90s, 91 through 99?  
 8 A. Yes.  
 9 Q. But not once out of gate 102?  
 10 A. Probably I might have, but I can't really  
 11 recall if I was or not. I know that I go to 100 a few  
 12 times, but I'm not sure why not 102.  
 13 Q. Going back to Exhibit 4, your statement, sir,  
 14 between the accident on October 7, 2003, and your  
 15 writing this report on October 14, 2003, during that  
 16 week that transpired, did you talk with anybody about  
 17 this accident?  
 18 A. Did I talk with anybody about this accident?  
 19 I don't recall specifically. I probably talked with  
 20 some ALPA people, flight safety at ALPA.  
 21 Q. Other than your union people, ALPA, did you  
 22 speak with anyone else?  
 23 A. No.  
 24 Q. To whom did you submit this report, Exhibit 4?  
 25 A. You know, I don't recall specifically who it

24 (Pages 90 to 93)

John Rediger

<p style="text-align: right;">Page 102</p> <p>1 international airports and stuff, but as far as I 2 remember there was none here. This would be the main 3 page that I would go to. 4 Q. And the five pages appear to be complete as 5 far as ground operations go, of Exhibit 9 to Russell's 6 deposition? 7 It appears to be complete, sir? 8 A. Appears to be. 9 Q. Have you brought with you here today any 10 documents reflecting the routing that Flight 809 11 requested for October 7, 2003? 12 A. No. 13 Q. Have you brought with you here today any 14 documents reflecting the routing that was assigned for 15 Flight 809? 16 A. No. 17 Q. Has anyone asked you to gather those 18 documents? 19 A. No. 20 Q. Have you seen those documents anyplace? 21 A. No. 22 Q. Do you know if those documents exist? 23 A. No. 24 Q. Haven't made any effort to search for those, 25 have you?</p>	<p style="text-align: right;">Page 104</p> <p>1 time on the monitor is 12:23. 2 (Noon recess taken.) 3 THE VIDEOGRAPHER: Coming back on the record. 4 The time on the monitor is 1:37 p.m. 5 Please begin. 6 MR. TURNER: Q. Hope you had a good lunch, 7 sir. 8 A. I did. 9 Q. Let me ask you, have you ever been involved in 10 any other accident or incident in connection with any 11 airplane at any time? 12 A. No. 13 Q. Have you ever been involved in any accident or 14 incident at United Airlines? 15 A. No. 16 Q. Have you ever been reprimanded by 17 United Airlines for any reason? 18 A. No. 19 Q. Have you ever been suspended by 20 United Airlines for any reason? 21 A. No. 22 Q. I think you did mention that you did get 23 furloughed back in the old furlough days? 24 A. I did. 25 Q. Can you give us a little bit of what that was</p>
<p style="text-align: right;">Page 103</p> <p>1 A. No. 2 Q. Nobody asked you to? 3 A. No. 4 Q. Do you know, sir, whether or not the flight 5 plan for the accident flight is still available? 6 A. Yes. 7 Q. You saw it this week? 8 A. Saw it -- I didn't look it over or anything, 9 but I saw it. 10 Q. Have you seen any document indicating that 11 there have been any changes in the procedures in ramp 12 Tower G as a result of this accident? 13 A. No. 14 Q. Has anyone ever told you that there have been 15 changes in the procedures at ramp Tower G as a result of 16 this accident? 17 A. No. 18 Q. Has anyone told you that any of the procedures 19 with regard to gate G102 have been changed -- 20 A. No. 21 Q. -- as a result of this accident? 22 A. No. 23 MR. TURNER: It's almost 12:30, why don't we 24 take lunch, and we'll see you back in an hour. 25 THE VIDEOGRAPHER: Going off the record. The</p>	<p style="text-align: right;">Page 105</p> <p>1 about. 2 A. In regards to what I did you mean? 3 Q. No. The reasons how the furloughs came about. 4 A. It was just economics, you know, very cyclic 5 industry at the time. And I got hired, I assumed that I 6 would be getting furloughed at some time. 7 Q. And what time period was that? 8 A. I was hired in '79 and furloughed in '80. 9 Q. And the furloughs were based on seniority 10 primarily? 11 A. That is correct. 12 Q. You had told us that there was a conference 13 call that you were in on sometime after the accident? 14 A. Uh-huh. 15 Q. I think -- did you call that a flight safety 16 inquiry? 17 A. FSI, that's correct. 18 Q. And do you know any of the trainers who were 19 on that conference call? 20 A. Well, there was trainers or people that were 21 on the conference call. I don't know if they would be 22 called trainers or not. 23 Q. I thought you mentioned some people that were 24 involved in training were on there. 25 A. The training center was. They have</p>

27 (Pages 102 to 105)